

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>DATE FILED:</b> _____
	:	
<b>v.</b>	:	<b>CRIMINAL NO.:</b> _____
	:	
<b>JEREMY FONTANEZ</b>	:	<b>VIOLATIONS:</b>
<b>RONALD MAPP</b>	:	
<b>DERELL BUCK</b>	:	<b>18 U.S.C. § 1951 (Conspiracy to interfere</b>
<b>KEVIN WASHINGTON</b>	:	<b>with interstate commerce by robbery - 1</b>
<b>SAMIR AARON</b>	:	<b>count)</b>
<b>KYLE PIERCE</b>	:	
	:	<b>18 U.S.C. § 1951 (Interference with</b>
	:	<b>interstate commerce by robbery - 12</b>
	:	<b>counts)</b>
	:	
	:	<b>18 U.S.C. § 924(c)(1)(A) (Carrying and</b>
	:	<b>using a firearm during and in relation to</b>
	:	<b>crime of violence - 12 counts)</b>
	:	
	:	<b>18 U.S.C. § 2</b>
	:	<b>(Aiding and abetting)</b>

**SUPERSEDING INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times relevant to this Indictment:

1. The following businesses were engaged in interstate commerce:
  - a. Game Gallery, located at 6200 Frankford Avenue, Philadelphia,  
Pennsylvania;
  - b. Young's Mart, located at 1461 North Gravel Pike, Lower Frederick  
Township, Pennsylvania;
  - c. Strawberry House, located at 3771 Layfield Road, Upper Hanover

Township, Pennsylvania;

d. Superstar Video, located at 1200 Welsh Road, Lansdale, Pennsylvania;

e. Game Gallery, located at 1865 Cottman Avenue, Philadelphia,

Pennsylvania;

f. Locust Bar, located at 235 South 10<sup>th</sup> Street, Philadelphia, Pennsylvania;

g. Pizza Hut, located at 300 Baltimore Pike, Clifton Heights, Pennsylvania;

h. Friendly's Restaurant, located at 1836 Catasaqua Road, Allentown,

Pennsylvania;

i. Adult Arcade, located at 1764 Route 309, Coopersburg, Pennsylvania;

j. Game Stop, located at 3110 Cheltenham Avenue, Philadelphia,

Pennsylvania; and

k. Country Chef Bar and Restaurant, located at 313 Main Street, Red Hill

Borough, Pennsylvania.

2. From on or about November 9, 2001, to on or about October 13, 2002, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
RONALD MAPP  
DERELL BUCK  
KEVIN WASHINGTON  
SAMIR AARON  
and  
KYLE PIERCE**

conspired and agreed together, with James Johnson, and with other persons known and unknown to the grand jury, to unlawfully obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, in the presence of employees and patrons of the

businesses set forth in paragraph 1 above, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, in violation of Title 18, United States Code, Section 1951(a).

### **MANNER AND MEANS**

It was part of the conspiracy that defendants **JEREMY FONTANEZ, RONALD MAPP, DERELL BUCK, KEVIN WASHINGTON, SAMIR AARON, and KYLE PIERCE** committed 12 separate armed robberies of the businesses listed in Paragraph 1 above, as follows:

3. Two or more of the defendants drove together in one or two vehicles to the businesses armed with weapons including a sawed-off shotgun, a .380 caliber semiautomatic pistol, a .45 caliber semiautomatic Taurus pistol, a black pellet gun, and baseball bats.

4. Two or more of the defendants entered the businesses pointing guns and with other weapons. During some of the armed robberies, one of the defendants remained in the car as a lookout and a getaway driver.

5. Pointing guns and while carrying other weapons, the defendants threatened and intimidated the employees and patrons inside the businesses. The defendants forced the employees and patrons who were present inside the businesses to other rooms including walk-in refrigerators, where they tied up and otherwise restrained the employees and patrons with plastic wire ties and duct tape. The defendants also took possession of cellular telephones, and ripped out telephones and telephone cords, or otherwise removed telephones to prevent their victims from calling the police or otherwise calling for help.

6. While inside the businesses, two or more of the defendants stole merchandise and cash, as well as personal items from the employees and patrons.

7. After the armed robberies, the defendants fled from the businesses in one or more vehicles and met to divide the stolen merchandise, cash, and other items among themselves.

### **OVERT ACTS**

In furtherance of the conspiracy and to effect the objects of the conspiracy, defendants **JEREMY FONTANEZ, RONALD MAPP, DERELL BUCK, KEVIN WASHINGTON, SAMIR AARON, and KYLE PIERCE**, together and with James Johnson and others both known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania:

#### **Game Gallery**

1. On or about November 9, 2001, defendants **JEREMY FONTANEZ and RONALD MAPP**:
  - a. drove together to the Game Gallery located at 6200 Frankford Avenue, Philadelphia, Pennsylvania;
  - b. entered the store, pointed a sawed off shotgun at a store employee, restrained him by taping his hands and legs together, and placed him into a back room; and
  - c. stole store merchandise and personal items from a store employee.

#### **Young's Mart**

2. On or about November 16, 2001, defendants **JEREMY FONTANEZ and RONALD MAPP**:
  - a. drove together to Young's Mart, located at 1461 North Gravel Pike, Lower Frederick Township, Pennsylvania;

- b. entered the store, pointed firearms at the employees, physically restrained them by duct taping their hands behind their backs, and placing them on the floor;
- c. ripped the telephone from the wall; and
- d. stole cash from a store safe and a purse from an employee.

### **Strawberry House**

3. On or about December 7, 2001, defendants **JEREMY FONTANEZ and RONALD MAPP:**

- a. drove together to the Strawberry House located at 3771 Layfield Road in Upper Hanover Township, Pennsylvania;
- b. entered the restaurant with a pistol and sawed off shotgun, ordered the employees to the floor, and physically restrained them by taping their hands behind their backs;
- c. stole cash from the cash register, a telephone from the restaurant, and cash and other personal items from an employee.

### **Game Gallery**

4. On or about December 11, 2001, defendants **JEREMY FONTANEZ, RONALD MAPP, and DERELL BUCK:**

- a. drove together to the Game Gallery located at 6200 Frankford Avenue in Philadelphia, Pennsylvania.
- b. **FONTANEZ and MAPP** entered the store with a firearm, while **BUCK** waited outside in a vehicle.
- c. Upon entering the store, **FONTANEZ and MAPP** forced the employees to the back of the store at gunpoint, physically restrained the employees by tying their hands with

plastic wire ties, and stole store merchandise and cash.

**Superstar Video**

5. On or about December 23, 2001, defendants **JEREMY FONTANEZ and RONALD MAPP:**

- a. drove together to Superstar Video located at 1200 Welsh Road in Lansdale, Pennsylvania;
- b. entered the store armed with a pistol and a sawed-off shotgun;
- c. forced the employees to the floor at gunpoint;
- d. physically restrained the employees by using duct tape and plastic wire ties to bind their hands, and feet, and by using duct tape to cover their eyes and mouths; and
- e. stole store merchandise, cash, and personal items from two store employees.

**Game Gallery**

6. On or about December 29, 2001, defendants **JEREMY FONTANEZ and RONALD MAPP:**

- a. drove together to the Game Gallery located at 1865 Cottman Avenue in Philadelphia, Pennsylvania;
- b. entered the store with a firearm and forced the employees at gunpoint into the rear of the store and onto the floor;
- c. physically restrained the employees by taping their hands and mouths; and
- d. stole two sets of keys.

### **Locust Bar**

7. On or about February 14, 2002, defendants **JEREMY FONTANEZ, RONALD MAPP, and DERELL BUCK**, together and with others unknown to the grand jury:

- a. drove together to the Locust Bar located at 235 South 10<sup>th</sup> Street in Philadelphia, Pennsylvania.
- b. upon arriving at the bar, the defendants entered the bar with firearms, and forced the employees and patrons into the basement and onto the floor at gunpoint;
- c. physically restrained the employees and patrons by taping their wrists; and
- d. stole approximately \$20,000 from the bar.

### **Pizza Hut**

8. On or about March 1, 2002, defendants **JEREMY FONTANEZ, RONALD MAPP, and DERELL BUCK**:

- a. drove together to the Pizza Hut located at 300 Baltimore Pike in Clifton Heights, Pennsylvania;
- b. entered the restaurant with firearms and forced the employees at gunpoint into a walk-in refrigerator; and
- c. stole cash from the restaurant and a cell phone from an employee.

### **Friendly's Restaurant**

9. On or about April 14, 2002, defendants **JEREMY FONTANEZ, RONALD MAPP, KEVIN WASHINGTON, and SAMIR AARON**:

- a. drove together to Friendly's Restaurant located at 1836 Catasaqua Road in Allentown, Pennsylvania;

b. **FONTANEZ, MAPP, and AARON** entered the restaurant with firearms, while **WASHINGTON** waited outside in the car; and

c. upon entering the restaurant, **FONTANEZ, MAPP, and AARON** forced employees and patrons into the rear kitchen area of the restaurant, then into the walk-in refrigerator, at gunpoint, and stole cash from the restaurant and four cell phones from the employees and patrons.

#### **Adult Arcade**

10. On or about April 18, 2002, defendants **JEREMY FONTANEZ, RONALD MAPP, KEVIN WASHINGTON, SAMIR AARON, and KYLE PIERCE:**

a. drove together to the Adult Arcade located at 1764 Route 309 in Coopersburg, Pennsylvania;

b. entered the store with firearms and forced an employee at gunpoint to open the cash register and empty cash into a bag;

c. physically restrained an employee and patrons by taping their wrists and forcing them into small booths in the rear of the store; and

d. stole cash from the store.

#### **Game Stop**

11. On or about June 3, 2002, defendants **RONALD MAPP, KEVIN WASHINGTON, SAMIR AARON, and KYLE PIERCE:**

a. drove together to the Game Stop located at 3110 Cheltenham Avenue in Philadelphia, Pennsylvania;

b. entered the store with a firearm;



c. physically restrained the employee by grabbing him and forcing him into a back room; and

d. stole merchandise from the store.

**Country Chef Bar and Restaurant**

12. On or about October 13, 2002, defendants **JEREMY FONTANEZ, RONALD MAPP, DERELL BUCK, KEVIN WASHINGTON**, and coconspirator James Johnson:

a. drove in two separate vehicles to the Country Chef Bar and Restaurant (“The Bar”), located at 313 Main Street, Red Hill Borough, Pennsylvania;

b. the defendants entered the Bar with a firearm and baseball bats, while James Johnson waited outside the bar;

c. the defendants threatened the employees and patrons of the bar by brandishing the firearm and baseball bats;

d. the defendants physically restrained the employees and patrons by tying their hands and feet with duct tape and plastic ties, and gagging their mouths with duct tape; and

e. the defendants stole cash from the bar and personal items from the patrons.

All in violation of Title 18, United States Code, Section 1951(a).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1.a. and 3 through 7 of Count One of this Indictment are incorporated here.

2. On or about November 9, 2001, at Philadelphia, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
and  
RONALD MAPP**

unlawfully obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendants JEREMY FONTANEZ and RONALD MAPP unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of store merchandise from the Game Gallery, located at 6200 Frankford Avenue in Philadelphia, Pennsylvania, in the presence of an employee of the Game Gallery and against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee of the Game Gallery, that is, by pointing a firearm at, demanding money from, tying up, and otherwise threatening an employee of the Game Gallery.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES:**

1. Paragraph 1.a. of Count One of this Indictment is incorporated here.
2. On or about November 9, 2001, at Philadelphia, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
and  
RONALD MAPP**

knowingly used and carried, and aided and abetted in the use and carrying of a firearm, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to interfere with commerce by robbery, and interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Counts One and Two of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1.b. and 3 through 7 of Count One of this Indictment are incorporated here.

2. On or about November 16, 2001, at Lower Frederick Township, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
and  
RONALD MAPP**

unlawfully obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendants JEREMY FONTANEZ and RONALD MAPP unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of cash from Young's Mart, located at 1461 North Gravel Pike, in Lower Frederick Township, Pennsylvania, in the presence of employees of the business and against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees of Young's Mart, that is, by pointing firearms at, demanding money from, tying up, and otherwise threatening the employees of the Young's Mart.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

2. Paragraph 1.b. of Count One of this Indictment is incorporated here.
2. On or about November 16, 2001, at Lower Frederick Township, in the Eastern

District of Pennsylvania, defendants

**JEREMY FONTANEZ  
and  
RONALD MAPP**

knowingly used and carried, and aided and abetted in the use and carrying of a firearm, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to interfere with commerce by robbery, and interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Counts One and Four of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1.c. and 3 through 7 of Count One of this Indictment are incorporated here.

2. On or about December 7, 2001, at Upper Hanover Township, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
and  
RONALD MAPP**

unlawfully obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendants JEREMY FONTANEZ and RONALD MAPP unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of cash and a telephone from the Strawberry House, located at 3771 Layfield Road, in Upper Hanover Township, Pennsylvania, in the presence of employees of the business and against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees of the Strawberry House, that is, by pointing firearms at, demanding money from, tying up, and otherwise threatening the employees of the Strawberry House.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1.c. of Count One of this Indictment is incorporated here.
2. On or about December 7, 2001, at Upper Hanover Township, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
and  
RONALD MAPP**

knowingly used and carried, and aided and abetted in the use and carrying of a firearm during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to interfere with commerce by robbery, and interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Counts One and Six of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1.a. and 3 through 7 of Count One of this Indictment are incorporated here.

2. On or about December 11, 2001, at Philadelphia, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
RONALD MAPP  
and  
DERELL BUCK**

unlawfully obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendants JEREMY FONTANEZ, RONALD MAPP, and DERELL BUCK unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of store merchandise from the Game Gallery, located at 6200 Frankford Avenue, in Philadelphia, Pennsylvania, in the presence of employees of the Game Gallery and against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees of the Game Gallery, that is, by pointing a firearm at, demanding money from, tying up, and otherwise threatening the employees of the Game Gallery.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.



**COUNT NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1.a. of Count One of this Indictment is incorporated here.
2. On or about December 11, 2001, at Philadelphia, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
RONALD MAPP  
and  
DERELL BUCK**

knowingly used and carried, and aided and abetted in the use and carrying of a firearm during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to interfere with commerce by robbery, and interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Counts One and Eight of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT TEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1.d. and 3 through 7 of Count One of this Indictment are incorporated here.

2. On or about December 23, 2001, at Lansdale, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
and  
RONALD MAPP**

unlawfully obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendants JEREMY FONTANEZ and RONALD MAPP unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of store merchandise and cash from Superstar Video, located at 1200 Welsh Road, in Lansdale, Pennsylvania, in the presence of employees of the business and against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees of Superstar Video, that is, by pointing a firearm at, demanding money from, tying up and gagging, and otherwise threatening the employees of Superstar Video.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT ELEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

3. Paragraph 1.d. of Count One of this Indictment is incorporated here.
2. On or about December 23, 2001, at Lansdale, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
and  
RONALD MAPP**

knowingly used and carried, and aided and abetted in the use and carrying of a firearm during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to interfere with commerce by robbery, and interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Counts One and Ten of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT TWELVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1.e. and 3 through 7 of Count One of this Indictment are incorporated here.

2. On or about December 29, 2001, at Philadelphia, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
and  
RONALD MAPP**

unlawfully obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendants JEREMY FONTANEZ and RONALD MAPP unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of cash and store equipment from the Game Gallery, located at 1865 Cottman Avenue, in Philadelphia, Pennsylvania, in the presence of employees of the business and against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees of the Game Gallery, that is, by pointing a firearm at, demanding money from, tying up and gagging, and otherwise threatening the employees of the Game Gallery.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT THIRTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

4. Paragraph 1.e. of Count One of this Indictment is incorporated here.
2. On or about December 29, 2001, at Philadelphia, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
and  
RONALD MAPP**

knowingly used and carried, and aided and abetted in the use and carrying of a firearm during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to interfere with commerce by robbery, and interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Counts One and Twelve of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT FOURTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1.f. and 3 through 7 of Count One of this Indictment are incorporated here.

2. On or about February 14, 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
RONALD MAPP  
and  
DERELL BUCK**

together and with others unknown to the grand jury, unlawfully obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendants JEREMY FONTANEZ, RONALD MAPP, and DERELL BUCK, together and with others unknown to the grand jury, unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, cash, that is, approximately \$20,000, from the Locust Bar, located at 235 South 10<sup>th</sup> Street, in Philadelphia, Pennsylvania, in the presence of employees and patrons of the business and against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees and patrons of the Locust Bar, that is, by pointing firearms at, demanding money from, tying up, and otherwise threatening the employees and patrons of the Locust Bar.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT FIFTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

5. Paragraph 1.f. of Count One of this Indictment is incorporated here.
2. On or about February 14, 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
RONALD MAPP  
and  
DERELL BUCK**

knowingly used and carried, and aided and abetted in the use and carrying of a firearm during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to interfere with commerce by robbery, and interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Counts One and Fourteen of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT SIXTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1.g. and 3 through 7 of Count One of this Indictment are incorporated here.

2. On or about March 1, 2002, at Clifton Heights, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
RONALD MAPP  
and  
DERELL BUCK**

unlawfully obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendants JEREMY FONTANEZ, RONALD MAPP, and DERELL BUCK unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of cash from the Pizza Hut restaurant, located at 300 Baltimore Pike, in Clifton Heights, Pennsylvania, in the presence of employees of the restaurant and against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees of the Pizza Hut restaurant, that is, by pointing a firearm at, demanding money from, placing into a freezer, and otherwise threatening the employees of the Pizza Hut restaurant.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.



**COUNT SEVENTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

6. Paragraph 1.g. of Count One of this Indictment is incorporated here.
2. On or about March 1, 2002, at Clifton Heights, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
RONALD MAPP  
and  
DERELL BUCK**

knowingly used and carried, and aided and abetted in the use and carrying of a firearm during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to interfere with commerce by robbery, and interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Counts One and Sixteen of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT EIGHTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1.h. and 3 through 7 of Count One of this Indictment are incorporated here.
2. On or about April 14, 2002, at Allentown, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
RONALD MAPP  
KEVIN WASHINGTON  
and  
SAMIR AARON**

unlawfully obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendants JEREMY FONTANEZ, RONALD MAPP, KEVIN WASHINGTON, and SAMIR AARON, unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of cash from the Friendly's Restaurant, located at 1836 Catasqua Road, in Allentown, Pennsylvania, in the presence of employees and patrons of the restaurant and against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees and patrons of Friendly's Restaurant, that is, by pointing firearms at, demanding money from, forcing into a freezer, and otherwise threatening the employees and patrons of the Friendly's Restaurant.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT NINETEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

7. Paragraph 1.h. of Count One of this Indictment is incorporated here.
2. On or about April 14, 2002, at Allentown, in the Eastern District of Pennsylvania,  
defendants

**JEREMY FONTANEZ  
RONALD MAPP  
KEVIN WASHINGTON  
and  
SAMIR AARON**

knowingly used and carried, and aided and abetted in the use and carrying of a firearm during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to interfere with commerce by robbery, and interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Counts One and Eighteen of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT TWENTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1.i. and 3 through 7 of Count One of this Indictment are incorporated here.

2. On or about April 18, 2002, at Coopersburg, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
RONALD MAPP  
KEVIN WASHINGTON  
SAMIR AARON  
and  
KYLE PIERCE**

unlawfully obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendants JEREMY FONTANEZ, RONALD MAPP, KEVIN WASHINGTON, SAMIR AARON, and KYLE PIERCE unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of cash from the Adult Arcade, located at 1764 Route 309, in Coopersburg, Pennsylvania, in the presence of an employee and patrons of the Adult Arcade and against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee and patrons of the Adult Arcade, that is, by pointing a firearm at, demanding money from, tying up, and otherwise threatening the employee and patrons of the Adult Arcade.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT TWENTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

8. Paragraph 1.i. of Count One of this Indictment is incorporated here.
2. On or about April 18, 2002, at Coopersburg, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
RONALD MAPP  
KEVIN WASHINGTON  
SAMIR AARON  
and  
KYLE PIERCE**

knowingly used and carried, and aided and abetted in the use and carrying of a firearm during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to interfere with commerce by robbery, and interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Counts One and Twenty of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT TWENTY-TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1.j. and 3 through 7 of Count One of this Indictment are incorporated here.
2. On or about June 3, 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendants

**RONALD MAPP  
KEVIN WASHINGTON  
SAMIR AARON  
AND  
KYLE PIERCE**

unlawfully obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendants RONALD MAPP, KEVIN WASHINGTON, SAMIR AARON, and KYLE PIERCE unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of store merchandise from the Game Stop, located at 3110 Cheltenham Avenue, in Philadelphia, Pennsylvania, in the presence of an employee of the business and against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee of the Game Stop, that is, by grabbing, demanding money from, forcing into a back room, and otherwise threatening the employee of the Game Stop.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT TWENTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

9. Paragraph 1.j. of Count One of this Indictment is incorporated here.
2. On or about June 3, 2002, at Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**RONALD MAPP  
KEVIN WASHINGTON  
SAMIR AARON  
and  
KYLE PIERCE**

knowingly used and carried, and aided and abetted in the use and carrying of a firearm during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to interfere with commerce by robbery, and interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Counts One and Twenty-Two of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT TWENTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1.k. and 3 through 7 of Count One of this Indictment are incorporated here.

2. On or about October 13, 2002, at Red Hill Borough, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
RONALD MAPP  
DERELL BUCK  
and  
KEVIN WASHINGTON**

together and with others known to the grand jury, unlawfully obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendants JEREMY FONTANEZ, RONALD MAPP, DERELL BUCK, and KEVIN WASHINGTON, together with others known to the grand jury unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of cash from the Country Chef Bar and Restaurant, located at 313 Main Street, in Red Hill Borough, Pennsylvania, in the presence of employees and patrons of the business and against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees and patrons of the Country Chef Bar and Restaurant, that is, by pointing a firearm at, demanding money from, tying up and gagging, and otherwise threatening the employees and patrons of the Country Chef Bar and Restaurant.

All in violation of Title 18, United States Code, Sections 1951(a) and 2.



**COUNT TWENTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraph 1.j. of Count One of this Indictment is incorporated here.
2. On or about October 13, 2002, at Red Hill Borough, in the Eastern District of Pennsylvania, defendants

**JEREMY FONTANEZ  
RONALD MAPP  
DERELL BUCK  
AND  
KEVIN WASHINGTON**

together and with others known to the grand jury, knowingly used and carried, and aided and abetted in the use and carrying of a firearm during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, conspiracy to interfere with commerce by robbery, and interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Counts One and Twenty-Four of this Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

\_\_\_\_\_  
**PATRICK L. MEEHAN**  
United States Attorney